

SUPPLEMENTARY REPRESENTATION



Mrs L Sullivan



22 April 2018

Local Plan Regulation 19 Representation
Planning Policy Team
Epping Forest District Council (EFDC)
Civic Offices
323 High Street
Epping
Essex CM16 4BZ

Dear Sir/Madam,

In response to the Epping Forest District Council's (EFDC) invitation for representation on the 'soundness' and 'legal compliance' of the Submission Version of the Local Plan, I would like to submit the following comments, as opposed to completing this request/the forms online. I understand that representations should be related to whether or not the Plan has been prepared in accordance with the relevant legal requirements, and whether or not the Plan is sound (positively prepared, justified, effective and consistent with national policy). **Please do not publish my personal details such as name or address that will breach my rights under privacy/GDPR regulations.**

SUPPLEMENTARY REPRESENTATION (as a resident of Epping)

Overall, I contend that the proposed EFDC Local Plan (specifically EPP.R1 and EPP.R2) is fundamentally unsound and cannot be justified. It should therefore be rejected.

In summary to re-highlight, this plan:

- Is not consistent with national policy;
- The Green Belt - not shown Exceptional Circumstances. Exceptional needs to be shown for each and every site; and



- There has been a failure to consider all other alternatives, specifically greater densification including in adjacent Local Planning Authority areas.

I have now had the opportunity to read the missing Epping Forest District Council (EFDC) Site Selection Report. Ref: *EB805P-Appendix-B1.6.6-Results-of-Identifying-Sites-for-Allocation.pdf* and have the following comments:

1. Removal of sites to the north of Epping / Theydon Bois without Justification

It appears that several large sites have been removed from North Epping, namely: SR-0071 Stonards Hill (109 houses removed), SR-0208 Theydon Place (65 homes removed), SR-0132ci Lower Bury Lane (62 houses removed), St Margaret's (192 houses removed), SR 1053 Stewards Green Road (304 homes removed)

It is my opinion that such sites were removed without fair justification. For example, the report states the following for Stonards Hill: "However, responses received through the Regulation 18 Draft Plan consultation indicated that the site is less preferred by the community". No other reason has been provided and as such my question is how the EFDC was able to justify that this site is less preferred by the community, in comparison to other sites?

As another example, I would like to highlight the proposed development east of Theydon Bois (e.g. SR-0026B and SR-0026C). The Report states: "Responses received through the Regulation 18 Draft Local Plan consultation indicated that the site is less preferred by the community".

It is my understanding that EFDC require an evidence-based approach, as per their own guidelines. Therefore, I would like to see the evidence behind justifying such a statement. So much needs to be done to make other sites remotely workable, yet seemingly obvious sites with less work/investment required have been removed from consideration. It is that the developers involved (the Times recently highlighted the influence of property developers on certain political party members) are really the ones steering the site selection, rather than what is best for the wider community? The Local Plan as it stands is not sound or justifiable and as such should be disregarded.

2. Regarding Land south of Brook Road. (SR-0069/33)

The report states that "...the site was considered to be more preferable in suitability terms than other sites in Epping which were proposed for allocation in the Draft Local



Plan (2016) and which are also located in the Green Belt". Where is the evidence for suitability?

It is my opinion that other sites such as Stewards Green Road are preferable from every conceivable angle. The only 'disadvantage' identified is: "growth to the south of Epping was considered to be more preferable in terms of landscape sensitivity and Green Belt harm compared with other strategic options around the settlement". One may argue that this is subjective, rather than evidenced based.

It is a fair argument that the Green Belt creating a buffer between Epping and the M25 is far more precious than any of the other sites proposed. Land north of Stewards Green is arguably not as precious. In any event the additional information that was omitted and has now been provided by EFDC does not provide adequate justification with real evidence (rather than empty statements) as to the sites proposed versus those no longer proposed.

3. If there is to be only one Masterplan in Epping/Theydon Bois

It appears that the EFDC 'solution' is to remove several suitable sites available in Epping and dump them in one "Masterplan", at a huge cost to the community. The proposed South Epping Masterplan (adjoining the M25), £8-£10 million cost of going over/under the Central Line, on land that floods in parts and hosts power lines, difficult topography, narrow single-track roads for access of which the main road is already very congested with traffic and parking, multiple land-owners, an already oversubscribed primary school and generally inadequate access to existing services (e.g. GP). There will be a huge cost to provide necessary infrastructure, potentially at the cost of providing social housing.

Why have the alternatives not been duly considered? For example:

- Stewards Green Road. See previous Representation. Low density, landscaped, sustainable and fully costed development, See Pigeon Developments for detail.
- North Weald Golf Club. See previous Representation. Low density, landscaped, sustainable (linked to A414/M11 so will not affect local traffic) and fully costed development. See Quinn Estates for detail.

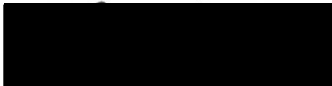


- Theydon Bois. Low density, landscaped, sustainable and fully costed development (CK Properties).

In conclusion, after waiting for the missing Site Selection Report, it does not appear there is adequate evidence of an evidence-based approach in relation to the site selection. Merely stating a “site is less/more preferred by the community” does not provide due and adequate evidence.

Given the lack of evidence in the Site Selection Report, one may argue that Appendices B & C were deliberately omitted, as the EFDC had not fairly and adequately justified the site selection before finalizing the submission. This on top of only allowing a short timescale over Christmas for representations does not feel a fair or due consultation process. Therefore, this Local Plan should go back to the drawing board and follow a fair, due and evidence-based approach.

Yours sincerely,

A black rectangular box redacting the signature of Mrs L Sullivan.

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